

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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US EPA RECORDS CENTER REGION 5



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TO: Bob Basch, Lansing District Office, HWD ✓  
FROM: Terry McNiel and Liz Browne, Technical Services Section, HWD  
SUBJECT: CME Summary Report, Total Petroleum Inc. - Alma, Michigan  
MID005358130

In summary of the CME inspections (sampling and analysis plan review/ observations, ERTEC, assessment plan review, geological review, and split sampling) conducted at the Total Petroleum, Inc., Alma facility, the following areas of deficiency have been identified:

1. The groundwater assessment should also include a specific effort to delineate the extent of the phenols (to include determination of the specific types of phenol). This should be submitted to both U.S. EPA and MDNR.
2. The eastern and western extent of the surficial aquifer must be defined as well as determining if contamination exists in those areas.
3. The lack of or degree of interconnection between the surficial and lower outwash aquifer must be demonstrated.
4. The downgradient extent of the groundwater contamination must be delineated. This will involve determining whether elevated TOC and conductivity levels around the tank farm are from the land treatment area or other source(s).
5. The 1,2-dichloroethane found in MW-15 by the May 22, 1986 MDNR split sampling must be investigated.
6. Field methods should be changed to ensure that non-aerated samples are obtained. This, as well as other changes/additions to the sampling and analysis plan outlined in the May 29, 1986, letter concerning the sampling inspection, should be implemented so that representative samples, and consistent analysis can be obtained.

Progress in defining the geological and geochemical conditions has been slower than should be expected. At the specifics of the closure plan and the corrective action are closely tied together, the groundwater clean-up should be evaluated along with closure options. In the meantime, the groundwater assessment should continue in an expeditious manner to adequately characterize site conditions.

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It is therefore recommended that the company be sent a letter of warning requesting an amendment of their existing assessment plan to address the noted deficiencies. These questions must be answered in order to develop an adequate, technically sound plan for corrective action.

If there are any questions regarding this evaluation, please call.

cc: Mr. J. Bohunsky/C&E File  
Mr. A. Howard  
Geotech File